

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY  
CAMDEN VICINAGE**

IN RE VALSARTAN, LOSARTAN, AND  
IRBESARTAN PRODUCTS LIABILITY  
LITIGATION

This document relates to:  
*All Actions*

No. 19-md-2875-RBK

Honorable Robert Kugler  
Special Master Thomas Vanaskie

**PLAINTIFFS' NOTICE OF MOTION  
FOR RULE 37 SANCTIONS  
AGAINST ZHP**

To: Seth A. Goldberg  
Duane Morris LLP  
30 South 17th Street  
Philadelphia, Pennsylvania 19103-4196

PLEASE TAKE NOTICE that on a date as soon as February 7, 2022, or as soon thereafter as counsel may be heard, Plaintiffs, by and through their undersigned counsel, shall move before the Honorable Robert B. Kugler and the Honorable Special Master Thomas I. Vanaskie for an order sanctioning ZHP under Rule 37.

Dated: December 30, 2021

Respectfully Submitted,

/s/ Ruben Honik  
Ruben Honik  
GOLOMB & HONIK, P.C.  
1835 Market Street, Ste. 2900  
Philadelphia, PA 19103  
Phone (215) 985-9177  
[rhonik@golombhonik.com](mailto:rhonik@golombhonik.com)

/s/ Daniel Nigh  
Daniel Nigh  
LEVIN, PAPANTONIO, THOMAS, MITCHELL  
RAFFERTY & PROCTOR, P.A.  
316 South Baylen Street  
Pensacola, FL 32502  
Phone: (850) 435-7013  
[dnigh@levinlaw.com](mailto:dnigh@levinlaw.com)

/s/ Adam Slater  
Adam Slater  
MAZIE, SLATER, KATZ & FREEMAN, LLC  
103 Eisenhower Pkwy, 2<sup>nd</sup> Flr.  
Roseland, NJ 07068  
Phone (973) 228-9898  
[aslater@mazieslater.com](mailto:aslater@mazieslater.com)

/s/ Conlee S. Whiteley  
Conlee S. Whiteley  
KANNER & WHITELEY, LLC  
701 Camp Street  
New Orleans, LA 70130  
Phone: (504)-524-5777  
[c.whiteley@kanner-law.com](mailto:c.whiteley@kanner-law.com)

*Counsel for Plaintiffs*